

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	Case No.: 2:17-CR-283
)	
)	MOTION FOR EXTENSION OF TIME TO
vs.)	FILE OBJECTIONS TO PRESENTENCE
)	REPORT
ZAKARYIA ABDIN)	

The undersigned respectfully requests an extension of at least twenty-one days from the original deadline to file objections to the presentence investigation report (PSR). The undersigned was served with the first draft of the PSR on Friday, November 16. The courthouse and office for the undersigned were closed for the Thanksgiving holidays from November 21-23. In accordance with Rule 32 of the Federal Rules of Criminal Procedure, objections are due on November 30, 2018.

Due to his heavy caseload, the undersigned has been unable to review the PSR with the Defendant at this time. He anticipates needing several meetings to review and respond to the PSR. He is currently scheduled for the first of those meetings tomorrow, November 29.

Some of the material needed by the Defense to adequately respond to the PSR are currently redacted and is classified material. Counsel for the Defendant has completed an FBI background check, and requested an opportunity to view the redacted materials. He has yet to be granted access to these materials.

Additionally, Counsel for the Defendant is scheduled for oral argument in an unrelated case on December 13, and needs significant time to prepare for that case. Because of the complexity of the factual and legal issues present in this case, the legal holidays since the Defense's receipt of the PSR, and the undersigned's heavy caseload, the Defendant moves for an extension of the time to file objections to the PSR.

Respectfully submitted,

/s/ Cody J. Groeber

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